

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Janelle A. Dixon  
Debtor

Rushmore Servicing as servicer for  
U.S. Bank National Association, not in  
its individual capacity but solely as  
trustee for RMTP Trust, Series 2021  
Cottage-TT-V

v.

Janelle A. Dixon  
Kenneth E. West  
Respondents

CASE NO.: 19-16266-pmm

CHAPTER 13

Judge: Patricia M. Mayer

Hearing Date: August 20, 2025

Objection Deadline: July 31, 2025

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

**PLEASE TAKE NOTICE**, that Rushmore Servicing as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V (on behalf of itself and together with any successor and/or assign "Movant"), filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. § 362 (d)(1); vacating the automatic stay to permit Movant, its successors and/or assigns, to enforce its mortgage on the Debtor's premises located at 134 Johns Rd, Cheltenham, PA 19012 (The "Property").

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before July 31, 2025 you or your attorney must do all of the following:

- (a) file an answer explaining your position at  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400, Courtroom 1  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Lauren M. Moyer  
Friedman Vartolo, LLP  
1325 Franklin Avenue, Suite 160  
Garden City, NY 11530  
Phone: (212) 471-5100  
Fax: (212) 471-5150  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Patricia M. Mayer at Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Courtroom 1, Philadelphia, PA 19107 on August 20, 2025 at 1:00 PM, unless otherwise ordered by the Court.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: July 17, 2025

By: /s/ Lauren Moyer  
Lauren M. Moyer, Esq.  
**FRIEDMAN VARTOLO LLP**  
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individual capacity but solely as trustee for RMTP  
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TO:

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Bankruptcy Trustee

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